

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JANE DOE 1, JANE DOE 2,
JANE DOE 3, JANE DOE 4,
JANE DOE 5, JANE DOE 6,
JANE DOE 7, JANE DOE 8,
JANE DOE 9, JANE DOE 10,
On behalf of themselves and
Others similarly situated,

Plaintiffs,

vs.

Lead Case No. 2:25-cv-10806
Former Case No. 2:25-cv-10946
Hon. Mark A. Goldsmith

THE REGENTS OF THE
UNIVERSITY OF MICHIGAN;
the UNIVERSITY OF MICHIGAN;
KEFFER DEVELOPMENT SERVICES, LLC,
and MATTHEW WEISS

Defendants.

DEFENDANT’S TIMELY RESPONSE TO SERVED COMPLAINT, RULE 6(b)
MOTION FOR EXTENSION, AND RESERVATION OF RIGHTS

Pro Se Defendant Matthew Weiss respectfully submits this filing in response to the original complaint properly served by Plaintiff, and states the following:

I. Response to Complaint Of Serving Plaintiff

1. Defendant was properly served with the Complaint on June 12, 2025 and files this motion within the 21-day period required under Federal Rule of Civil Procedure 12(a)(1)(A)(i).

2. Defendant intends to defend this matter on the merits and respectfully reserves the right to file a more detailed responsive pleading, including any applicable defenses under Rule 12, upon further direction of the Court.

3. Defendant preserves all defenses under Rule 4(m) and Rule 12(b)(5) as to the other plaintiffs who did not effectuate proper service. This includes plaintiffs who pursued default without valid service and those who have not initiated valid service.

4. Although Defendant has not yet been served with the consolidated complaint, he waives formal service of that complaint as a good faith gesture to promote efficiency. This waiver does not waive, cure, or retroactively validate any deficiencies in service of the original complaints by other plaintiffs. Defendant expressly preserves all defenses under Rule 4(m) and Rule 12(b)(5) as to those plaintiffs.

5. Defendant reserves all rights to seek a stay or other appropriate relief should circumstances warrant it in the future. At this time, however, Defendant intends to proceed and address the claims on the merits in the interest of orderly and efficient litigation.

II. Rule 6(b) Motion For Extension of Time to Respond to Consolidated Complaint

Pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, Defendant respectfully requests an extension of time to respond to the consolidated complaint until September 8, 2025, which is 21 days after the current response deadline of August 18, 2025, for the University of Michigan and Keffer Development Services.

This request is made in the interest of judicial efficiency, as the responses of the other defendants are likely to clarify or streamline the legal and factual issues before the Court, and may eliminate certain claims altogether. Defendant also notes that the other parties response

deadline could be modified, and therefore respectfully requests that his deadline be tied to 21 days after the University of Michigan and Keffer Development Services initial response deadline, or any other date the Court deems appropriate.

Defendant submits that this is the first request for an extension and that it is not made for purposes of delay or prejudice.

III. Conclusion

Defendant respectfully submits this timely response, requests a modest and reasonable extension under Rule 6(b), and affirms his intent to address the claims on the merits.

Defendant reaffirms his waiver of formal service of the consolidated complaint as a gesture of good faith and judicial economy. This waiver does not waive or cure any deficiencies in service of the original complaints by other plaintiffs. Defendant expressly preserves all defenses under Rules 4(m) and 12(b)(5) as to those plaintiffs.

Any plaintiff who failed to effect timely and proper service under Rule 4(m) bears the burden of seeking relief from that failure. Defendant expressly reserves the right to oppose any such request on all appropriate grounds, including undue delay and resulting prejudice.

Defendant respectfully requests that the Court grant the Rule 6(b) extension requested herein, or adopt such alternative schedule as it deems just and appropriate in light of the procedural posture of the consolidated action and the interests of efficient case management.

Respectfully submitted,

/s/ Matthew Weiss

Pro Se Defendant

2075 W Stadium Blvd #1066

Ann Arbor, MI 48106

Dated: July 1, 2025

CERTIFICATE OF SERVICE

I hereby certify that on July 1, 2025, I served a copy of the foregoing “DEFENDANT’S
TIMELY RESPONSE TO SERVED COMPLAINT, RULE 6(b) MOTION FOR EXTENSION,
AND RESERVATION OF RIGHTS,” to Lisa Esser, One Town Square, 17th Floor, Southfield,
MI 48076 by Priority U.S. Mail, postage prepaid.

/s/ Matthew Weiss

Pro Se Defendant

2075 W Stadium Blvd #1066

Ann Arbor, MI 48106